

# **EXHIBIT PP**

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COMMONWEALTH OF MASSACHUSETTS

FOR THE DISTRICT OF MASSACHUSETTS

\*\*\*\*\*

SONYA LARSON,

Plaintiff

vs.

No. 1:19-CV-10203-IT

DAWN DORLAND PERRY, ET AL,

Defendants

\*\*\*\*\*

ZOOM DEPOSITION of DAWN DORLAND PERRY

APPEARING REMOTELY

Friday, September 3, 2021 - 11:00 a.m.

Reporter: Jill Kourafas, RPR, MA CSR#149308

Appearing remotely from Norfolk County

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1 end a letter, would you agree?

2 A. I chose to end it that way.

3 Q. Okay. And then you signed it "Kindly,  
4 Dawn"?

5 A. That's what is here in the document, yes.  
6 That's my customary email signature.

02:44PM

7 Q. That's what I understand you claim, yes.  
8 So would you characterize your letter as  
9 being basically factual?

10 MS. ELOVECKY: Objection.

02:45PM

11 A. I hear the word "factual," I think of two  
12 possibilities. It could mean does it contain  
13 only facts or does it tend to emphasize facts?  
14 So I'm confused.

15 Q. Well, does it contain facts?

02:45PM

16 MS. ELOVECKY: Objection.

17 A. Yes, it contains facts.

18 Q. What facts does it contain?

19 MS. ELOVECKY: Objection.

20 A. Is my task to go through and call out --  
21 do a reading, a mental reading and call out the  
22 facts as I read them?

02:45PM

23 Q. Yes, please.

24 A. Okay. I'm stuck on whether recipient is

1 a fact or not. There's a recipient. So okay,  
2 there's a fact.

3 My name is Dawn Dorland, fact.

4 I was 35 at the time. I am still white,  
5 I am still female. And -- well, we didn't --

02:46PM

6 Q. I'm sorry, you are absolutely correct. I  
7 don't mean to intercede.

8 A. And I then "I am now living with my  
9 husband in LA." Those are all facts.

10 Are you keeping a tally?

02:46PM

11 The next phrase is a fact about the date  
12 when I first learned about living kidney donation  
13 and it was in an article.

14 The next part of the sentence is  
15 compound, but it is factual describing how I  
16 interacted with the need for and the possibility  
17 of a living kidney donation over the intervening  
18 years from 2009, the composition of the letter,  
19 2015.

02:47PM

20 And then the last sentence of that  
21 paragraph I say I believe that I knew. That's  
22 getting maybe a little more emotional and  
23 speculative, but it was true if that's what you  
24 mean by "facts," that's also a fact.

02:47PM

1 Q. I'm sorry.

2 A. I'm happy to stop because I want to make  
3 sure I'm being helpful in answering your  
4 question.

5 what did you want to say about that  
6 sentence?

02:47PM

7 Q. I don't know what sentence you're  
8 referring to.

9 A. Okay.

10 I was referring to the sentence beginning  
11 "I believe that I knew" at the end of the second  
12 full paragraph of my letter.

02:47PM

13 Q. All right. Got it.

14 A. And it is an emotional truth I'm trying  
15 to describe. I'm not totally clear on what you  
16 consider a fact for this purpose, but I'll go on.

02:48PM

17 That I was beckoning back to the not  
18 being able to shake the feeling in the  
19 intervening years that I could do something to  
20 help the situation of people who need kidneys and  
21 have no living donor, that I was in every  
22 position to give, why not me? And I couldn't  
23 shake that feeling.

02:48PM

24 And so that's the fact I'm trying to

1 convey in that sentence. It's an emotional  
2 truth.

3 Q. But it's certainly a truth that you felt?

4 A. Yes.

5 Q. At the time?

02:48PM

6 A. Yes.

7 Q. Okay.

8 A. In that sense the entire level is  
9 factual. Shall I keep going?

10 Q. Please.

02:49PM

11 A. Okay.

12 So the next sentence I'm looking at is  
13 "Once I had all the information" and now I'll  
14 look at it.

15 (Pause.)

02:49PM

16 Here I'm describing factually how I felt  
17 about this opportunity. It only motivated me  
18 more, as I think I described earlier, to donate  
19 my kidney when I could impact not only one  
20 person's body, but many people's bodies, and then  
21 extension into their lives and their families'  
22 lives.

02:49PM

23 And then --

24 Q. That was the feeling that you had at the

1 time that you wrote the letter, is it not?

2 MS. ELOVECKY: Objection.

3 A. Yes. As -- I was trying to say that I'm  
4 sorry if I didn't, that's what I meant, that this  
5 sentence captures my feeling based on the facts I  
6 had engaged with during my research of the  
7 process.

02:49PM

8 There's a lot of facts in that sentence  
9 about how living kidney donation works in our  
10 country.

02:50PM

11 So I would not agree that it's just a  
12 sentence about a feeling. I disagree with that.

13 Q. Okay. Please go on.

14 A. The next sentence begins "Personally" and  
15 the first part of the sentence I say "My  
16 childhood was marked by trauma and abuse." Fact.  
17 Then with a semicolon, I attached the sentence,  
18 the independent clause, "I didn't have the  
19 opportunity to form secure attachments with my  
20 family of origin."

02:50PM

02:50PM

21 This is -- there's many ways that we can  
22 understand our human interactions, our  
23 relationships, and also the way our psychology  
24 forms. You know, we get back to the nature

1 versus nature debate, but at the time,  
2 especially, I had begun to learn about attachment  
3 theory in relationships, and that is evident in  
4 how I composed this part of my letter.

5 That at the time I was starting to think  
6 about, and you can apply -- one can apply many  
7 lenses to one's life. At the time I was applying  
8 the lens of attachment theory, which, I believe,  
9 comes out of psychology.

02:51PM

10 Q. Okay.

02:51PM

11 A. Okay. The next sentence I will look at  
12 starts with "A positive outcome." In this  
13 sentence I'm -- you could say I'm looking at the  
14 bright side. There are many costs as an aside to  
15 you, Attorney Epstein, I've been faced with many  
16 costs with the way I was raised and the  
17 circumstances I was born into from abuse to  
18 poverty and neglect; however, as an adult I also  
19 see and I'm proud of the person now that those  
20 experiences shaped me into, and that's how I can  
21 be optimistic and actually even identify positive  
22 outcomes of pretty harrowing young circumstances,  
23 and that's what I'm trying to say in this next  
24 sentence.

02:51PM

02:52PM



1           On the other hand, my experiences were so  
2   from a singular, and in some ways isolating that  
3   I've ended up being this kind of person who will  
4   do this for a stranger. And you, yourself, said  
5   in this deposition that you don't know that many  
6   people who have done this. And I think that I  
7   was anticipating a response from people and,  
8   indeed, I already started to receive a response  
9   of "Why are you different than me? And why were  
10   you, Dawn, specifically motivated to do this?"

02:52PM

02:52PM

11           And that's what I'm grasping towards with  
12   that line.

13           Q.   Okay. That's good.

14           A.   And the next sentence, I think is kind of  
15   in the same bucket, Attorney Epstein, while  
16   perhaps many more people. I'm here talking about  
17   my own experience of outsidersness because of my  
18   upbringing in rural poverty and having been  
19   abused that, well, on the bright side, I'm doing  
20   something that people who are really entrenched  
21   in families and have maybe secure attachments  
22   with their family of origin, they wouldn't dream  
23   of doing it, they wouldn't need to do, or it  
24   would never occur to them. But someone that

02:53PM

02:53PM

1 lived outside of my family of origin, through no  
2 fault of my own at least, on the bright side,  
3 here I am electing to do this and that's a  
4 positive outcome of what is otherwise pretty  
5 harrowing circumstances.

02:53PM

6 Q. Okay. You wanted to be helpful to other  
7 people, and that's a good thing. would that be a  
8 fair characterization?

9 A. It is fair, but incomplete.

10 Q. Sure. Understood.

02:53PM

11 A. And then I -- before I go on, I should  
12 say that I felt very satisfied to lyrically state  
13 that in the phrase "The suffering of strangers is  
14 just as real" because I was trying to articulate  
15 to this unknown person why this person did matter  
16 to me even though I didn't know them and I had no  
17 formal connection to them, blood or otherwise.

02:54PM

18 The next sentence begins with "I can't  
19 tell you how happy" and it's a fact that I was  
20 pleased. I was gratified that all the surgeries  
21 went well because the main challenge before me,  
22 preparing for surgery was to run through all the  
23 risks and all the poor outcomes that could occur.  
24 I had to not only sign waiver forms saying I

02:54PM

1 wouldn't hold anyone responsible if, one, my  
2 kidney got left on an airplane; two, my kidney  
3 got left in a cab; three, the doctor dropped my  
4 kidney on the floor and stepped on it.

5 I mean, now I'm kind of paraphrasing, but  
6 I had to waive rights and indemnify anyone  
7 against liability that could occur just out of  
8 accident or circumstance.

02:55PM

9 I had to prepare, Attorney Epstein, for  
10 the possibility that I could die on the table  
11 during my retrieval surgery, my recipient could  
12 die on the table during his transplant surgery.  
13 My kidney could be transplanted successfully and  
14 fail and cause that person's death. My recipient  
15 could have a rejecting reaction in his body and  
16 reject my kidney. And I know it's a "he" now,  
17 but he or she could suffer very harmful health  
18 consequences from that situation.

02:55PM

02:55PM

19 I had to sit with all those risks and I  
20 had to face them as an individual, and I had to  
21 decide if I wanted to do it anyway.

02:56PM

22 I'm sorry. My screen froze. Let me get  
23 back to the exhibit. I forgot where I started  
24 that train of thought.

1           So that's why I was so pleased to cut the  
2 chase. I was so pleased that everybody's  
3 surgeries was successful, and not only that, we  
4 got to meet and it was very gratifying to all of  
5 us.

02:56PM

6           Then the next sentence begins:  
7 "Throughout my preparation of becoming a donor,"  
8 here I am trying to articulate -- and I know my  
9 task here is facts -- again, I'm trying to state  
10 as accurately as possible for this person who may  
11 never hear from me again how I centered them and  
12 what this meant for them through the whole  
13 process.

02:56PM

14           (Crying.)

15           And, yes, that factually states my  
16 emotions.

02:57PM

17           Then the next part of the letter begins  
18 "My gift" and it was factual that I had no  
19 expectations for receiving anything from my  
20 gesture.

02:57PM

21           And then the next part of the letter I  
22 write "That this person is deserving because when  
23 someone needs to be medically cleared to receive  
24 a kidney, they have to jump through their own

1 hoops, and this person may have felt that they  
2 didn't even deserve to ask anyone to do this for  
3 them. And when I realized that as many as half  
4 of the people who need this, never ask anyone. I  
5 was so moved and I was so motivated to be there  
6 for them.

02:58PM

7 It's an extension maybe of me imagining  
8 that I could be that person because of my lack of  
9 family connections and my history with shame and  
10 stigma, and so I did it for that person, but I  
11 was also doing it for myself, and so that's a  
12 fact.

02:58PM

13 The next paragraph begins "Please know"  
14 and that's factually stating how my family and I  
15 felt about what I was sending into the world and  
16 that we were completely at peace with it, and we  
17 wanted this person to know, you don't have to  
18 feel obligated, you deserve this and we need  
19 nothing from you. Be well. Be well. And that's  
20 a fact.

02:58PM

21 That brings us to the end of the letter  
22 where I sign it "Kindly, Dawn" which is how I  
23 sign all my correspondence to this day. And then  
24 I included my email address. This person could

02:59PM

1 still contact me tomorrow. I have no idea. I  
2 forgot my email was in there. Maybe I'll have a  
3 surprise one day. I don't know.

4 Q. From the emotions that you just  
5 displayed, you obviously did receive something  
6 about your gesture of donating a kidney, you did  
7 something nice for the world, nice for the person  
8 who got Debbie Striks' kidney, and as you said,  
9 you did it for yourself too.

02:59PM

10 So even though this recipient hasn't  
11 gotten to you, you feel better about this, don't  
12 you, about having giving a kidney, even to this  
13 day?

03:00PM

14 A. Well, it's a very complicated question to  
15 field in the middle of litigation that has come  
16 out of this gesture, but I can answer by saying  
17 that when you go through donor education, the  
18 only thing, and this is even medically, medically  
19 when you become a living kidney donor, my surgeon  
20 told me, my transplant surgeon said,  
21 "Technically, in terms of your own life  
22 expectancy, Dawn, you will lose a month of your  
23 life expectancy." He told me, "I cannot  
24 medically tell you that this is good for your

03:00PM

03:00PM

1 health, but everyone always says the only thing  
2 you get is to feel good about it."

3 And I narratively, because I'm a writer  
4 and an artist, the way I handled people wanting  
5 to know "why did you do this and why don't I want  
6 to do it?" The way I handled that in this letter  
7 was to excavate the personal reasons, but that  
8 does not mean that I primarily did it for myself,  
9 and I assure you there's been many times, even  
10 though I do not in the least regret my kidney  
11 donation, and I told my recipient that, but there  
12 have been many times that what has come out of  
13 this process and what Sonya did with my work, has  
14 caused me trauma and harm.

03:01PM

03:01PM

15 And so, no, I haven't been able to just,  
16 in an unfettered way, feel good about what I have  
17 done. No, I have not which is different than  
18 regretting it.

03:01PM

19 Q. Understood.

20 A. Thank you.

03:02PM

21 MR. EPSTEIN: Before I forget, I would  
22 like to mark Exhibit 1 as Exhibit B in this  
23 deposition, which is an email chain that includes  
24 Samantha Shea. Really the part I'm zeroing in on

1           So, no, it didn't make me sick. Again, I  
2 was surprised. It got worse. That wasn't the  
3 bad part.

4           Q. Well, I'm going to go in increments. I  
5 don't want to jump around too, too much.

04:19PM

6           Do you know of any reason why Sonya was  
7 prevented in any way from writing a story that  
8 contained something about a kidney donation?

9           MS. ELOVECKY: Objection.

10          A. No, of course not. That's not true.  
11 She's not prevented from writing a story about a  
12 kidney donation. Of course not.

04:20PM

13          Q. You claim that Sonya and you were good  
14 friends, don't you?

15          A. (No response.)

04:20PM

16          MS. ELOVECKY: I'm sorry, Dawn. You have  
17 to say that out loud, your answer.

18          A. I'm confused because you used two tenses  
19 of verbs. You used present and the past, I  
20 believe. Could you restate? I didn't think you  
21 were done with your question, that's why I didn't  
22 speak.

04:20PM

23          Q. Okay. Did you think that in the latter  
24 part of 2015, before you heard from Tom Meek



1 about Ms. Larson reading a portion of her story  
2 in the Boston bookstore that you and Ms. Larson  
3 were friends?

4 A. Certainly.

5 Q. What do you base your friendship on?

04:21PM

6 MS. ELOVECKY: Objection.

7 You can answer.

8 A. Years of getting to know one another and  
9 sharing our lives and meeting for drinks and  
10 being in a really exciting group of mutual  
11 friends and writers, working writers, and  
12 teachers, and us climbing the rungs and going to  
13 grad school at the same time, and us being around  
14 the same age and solidifying and leaving romantic  
15 relationships all at the same time, and the  
16 emails we shared.

04:21PM

04:21PM

17 Yeah, I definitely considered her a  
18 friend. She was one of the only three writers --  
19 I mentioned the other two -- who I added to the  
20 group even though I didn't have time to have a  
21 personal conversation because my surgery was  
22 scheduled to my surprise so swiftly. I had no  
23 way to imagine that this is what would happen by  
24 my allowing myself in friendship to be vulnerable

04:21PM

1 to my friend Sonya.

2 Q. You said that you shared drinks together.  
3 Did you ever go out, just the two of you, to a  
4 bar or to a restaurant and just have a drink?

5 A. Yes. I did not hear the end of your  
6 question. I was answering and you were still  
7 speaking.

8 Q. "At any time" was the last part of my  
9 question. I'll repeat the question.

10 Did you and Sonya go out together, just  
11 the two of you, and have a drink together at any  
12 time?

13 A. Yes.

14 Q. When?

15 A. In 2009.

16 Q. Any other times?

17 A. Yes, I believe so.

18 Q. When?

19 A. Around that same time and into the  
20 following year.

21 Q. So twice in 2009 and once in 2010?

22 MS. ELOVECKY: Objection.

23 A. That's not what I said.

24 Q. What did you say?

04:22PM

04:22PM

04:22PM

04:23PM

1       A.    Could we have the record read back,  
2    please?

3       Q.    We could.  But I just want -- we are not  
4    going on the record right now.  I want to go on  
5    what your memory is.

04:23PM

6                You said when I asked you if you ever had  
7    drinks together and you said "yes," and I said  
8    "when," you said "2009" and then I think you said  
9    "another time in 2009."  Were there two occasions  
10   in 2009 or just one?

04:23PM

11       A.    It's possible there was more than one.  
12   The reason I'm certain about one is because there  
13   was an email and also because I remember that  
14   particular conversation.

15               And, you know, the way memory works is  
16   if your -- the way I understand it, if you are in  
17   the same place, you don't necessarily create a  
18   distinct memory.  And I've also seen emails where  
19   we reference this bar, Troquet, on the Boston  
20   Common, "Let's go get a drink at Troquet."  And  
21   so my memory seems solidified by an email I'd  
22   seen that we did it a couple times at least and  
23   certainly at least once.

04:23PM

04:24PM

24       Q.    You and Sonya went together, the two of

1 you to a bar, a restaurant called "Troquet" on  
2 the Boston Common, and you had a drink together,  
3 is that what your testimony is?

4 A. Yes.

5 Q. And you claim there's an email that  
6 confirms this meeting?

04:24PM

7 A. There's emails that suggest more than one  
8 meeting. But I know for certain we did it at  
9 least once. And there are emails that seem to  
10 evidence that. I just happened to see these  
11 emails in the course of my document production  
12 responding to your requests.

04:24PM

13 Q. So you produced the emails wherein this  
14 meeting between you and Ms. Dorland [sic-Larson]  
15 happened in 2009?

04:25PM

16 MS. ELOVECKY: Objection.

17 A. I'm Ms. Dorland. I'm Dawn.

18 Q. You produced emails that confirm that you  
19 and Ms. Larson met at a bar called "Troquet" in  
20 Boston and had a drink together sometime in 2009?

04:25PM

21 MS. ELOVECKY: Objection.

22 A. I can't answer that because I don't  
23 decide about production. I relied on my counsel.

24 Q. Did you ever share meals together, just

1 the two of you?

2 A. Possibly, but I don't have a distinct  
3 memory. It might have been at a conference,  
4 either Sonya's conference, the Muse, or AWP.  
5 It's called "AWP," like "apple," "Washington,"  
6 "pear."

04:26PM

7 It stands for the Association of Writing  
8 Programs, and it's just morphed into being a  
9 professional writing conference with about 10,000  
10 writers a pop.

04:26PM

11 Q. Other than at the conferences, did you  
12 and Ms. Larson ever go out to dinner together?

13 A. I remember just --

14 MS. ELOVECKY: Objection.

15 But you can answer.

04:26PM

16 A. I remember distinctly having Sonya in my  
17 home for a meal when I was moving to Maryland, DC  
18 for my MFA. She --

19 Q. Tell me --

20 A. I'm still speaking. May I finish?

04:27PM

21 Q. You may finish. I wish your answers were  
22 a little shorter sometimes, but you may finish.

23 MS. ELOVECKY: Objection. This is a  
24 deposition. Her answers are her answers.

1           A.    Sonya attended at least one meal in my  
2   home that I prepared and it wasn't a very big  
3   group.  There were six people.  There's a  
4   photograph of it.  It was my sendoff and it's the  
5   dinner where she brought me a gift which was  
6   unexpected and really lovely and special to me.

04:27 PM

7           And that's why I -- when I moved -- I'm  
8   still speaking Attorney Epstein. May I finish?

9 Q. Go ahead.

10           A.    Thank you.

04:27 PM

11 And that's why when I left Boston, I  
12 considered Sonya such a great friend because I  
13 thought that she -- she really distinguished  
14 herself from other people even at that very  
15 meaningful gathering of mine. And then I believe  
16 that she may have also attended a Valentine's  
17 dinner.

04:27 PM

18 My husband had a tradition of cooking  
19 valentine's dinner for friends and opening that  
20 day up to friendship. And I remember seeing  
21 emails where Sonya was talking about coming. I  
22 had invited her. So that's at least two. Those  
23 are meals in my home that I cooked.

04:28 PM

24 MS. ELOVECKY: And, Drew, for the record

1 if you are going to ask the question, I'd ask you  
2 not roll your eyes and shake your head while my  
3 client is answering it. If you want a complete  
4 answer to your questions, you need not to react  
5 in that fashion.

04:28PM

6 MR. EPSTEIN: The only reason I'm rolling  
7 my eyes, if I am, in fact, rolling my eyes is  
8 that her answers are very long. Sometimes  
9 very long --

10 MS. ELOVECKY: Honestly, that was less  
11 than 60 seconds.

04:28PM

12 MR. EPSTEIN: Let me finish what I'm  
13 saying. And when you object, instead of  
14 objecting with an exacerbated "ha" in your voice,  
15 you know, if you stop that, I will stop, you  
16 know, eye contact or eye movements that I have.

04:28PM

17 Q. What was the gift that Ms. Dorland -- I'm  
18 sorry. Let me start that again.

19 What was the gift Ms. Larson gave you,  
20 Ms. Dorland?

04:29PM

21 A. In the card that accompanied the gift  
22 that Sonya brought to my going-away dinner, which  
23 we called the "boo-hoo dinner" because we were  
24 leaving Boston, she described that gift as a

1 manuscript, because I was embarking on my career  
2 in the MFA and it consisted of -- what I  
3 identified as awesome sundry organizational tools  
4 from one of my favorite shops in Harvard Square  
5 called the "Museum of Useful Things," I believe,  
6 and going on memory, it was a nice document,  
7 envelope like with a hard side and bungee cord to  
8 close it, and also a page holder so one could  
9 have a printed page, a paper page alongside a  
10 screen and also a package of giant paper clips.  
11 I probably have one on me somewhere because I  
12 still use them, and I became famous for using  
13 them in my teaching at the University of  
14 Maryland, and there may have been one or two  
15 other things, but that's what I remember, and the  
16 card.

04:29PM

04:29PM

04:30PM

17 Q. I'm sorry, are you finished?

18 A. After saying "and the card," then I'm  
19 finished, yes.

20 Q. You also said there's a photograph. Did  
21 you produce the photograph?

04:30PM

22 A. I didn't make any decisions about  
23 production. I relied on the advice of my  
24 counsel.



1 Q. You said there's a photograph taken at  
2 this meal at your house, the going-away meal, the  
3 "boo-hoo meal," whatever you called it.

4 Do you still have a copy of that  
5 photograph?

04:30PM

6 A. Yes.

7 Q. I'm going to ask that you not destroy it  
8 and we might ask you to produce it.

9 A. Noted.

10 MR. EPSTEIN: Jill, I'm going to close up  
11 very quickly.

04:31PM

12 Q. Have you ever heard of a writer by the  
13 name of Melissa Yancy?

14 A. Yes.

15 Q. What do you know she has written?

04:31PM

16 A. Melissa Yancy, to my knowledge, won the  
17 Drew Heinz fiction prize for her short story  
18 collection "Dog Years." And one of the stories  
19 is about a kidney chain where I believe --  
20 actually, I haven't read the story, I just  
21 identified it. And it's in my to-be read pile  
22 years later still, but she told me in an  
23 interaction, I believe on Facebook probably, that  
24 that story which I believe is called "Go Forth,"

04:31PM

CERTIFICATE

Commonwealth of Massachusetts

Norfolk, ss.

I, Jill M. Kourafas, a Notary Public in  
and for the Commonwealth of Massachusetts, do  
hereby certify:

That DAWN DORLAND PERRY, the witness  
whose deposition is hereinbefore set forth, was  
duly sworn by me and that such deposition is a  
true record of the testimony given by the said  
witness.

IN WITNESS WHEREOF, I have hereunto set  
my hand this 5th day of October, 2021.

*Jill Kourafas, CSR, RPR*

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Jill Kourafas, Notary Public  
Registered Professional Reporter  
Certified Shorthand Reporter  
License #149308

My Commission expires:  
June 11, 2027

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CERTIFICATE

Commonwealth of Massachusetts

Norfolk, ss.

I, Jill M. Kourafas, a Notary Public in  
and for the Commonwealth of Massachusetts, do  
hereby certify:

That DAWN DORLAND PERRY, the witness  
whose deposition is hereinbefore set forth, was  
duly sworn by me and that such deposition is a  
true record of the testimony given by the said  
witness.

IN WITNESS WHEREOF, I have hereunto set  
my hand this 5th day of October, 2021.

*Jill Kourafas, CSR, RPR*

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